Weyerhaeuser

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March 26, 2008

Mr. Sam Chummar, Remedial Project Manager
U.S. Environmental Protection Agency - Region 5
Superfund Division - Remedial Response Branch #1
77 W. Jackson Blvd. (SR-6J)
Chicago, IL 60604

Subject: Letter Request for Approval of Cover for 200 Feet Along the Bank in Zone C
Plainwell Mill Banks Emergency Response Action
Plainwell Mill Property, Plainwell, Michigan
Allied Paper, Inc./Portage Creek/Kalamazoo River Site - Operable Unit 5

Dear Mr. Chummar:

In accordance with our verbal request made on March 14, 2008, to approve capping along 200 feet of Zone C in the area of high flow, this letter details the results of the sampling performed in this area and the basis for this request. During a screening reconnaissance performed on the area on March 14, 2008, six shallow excavations along the shoreline were sampled and material was sent for polychlorinated biphenyls (PCBs) analysis. The soils observed in these excavations had no evidence of visible paper residuals. Analytical results on the samples obtained from the test excavations are attached. The bank soils sampled exhibited levels of 0.012 to 0.35 mg/kg of total PCBs.

During the site visit on March 19, 2008, with Jim Hutchens of RMT, Paul Bucholtz of the MDEQ, and yourself, six additional samples were obtained with a hand auger approximately 1 foot out from the water/bank interface in the same area of Zone C. The samples were collected at a depth of approximately 6 to 10 inches below riverbed surface. Figure 1 identifies all sample locations. The measured concentrations of total PCB ranged from 0.092 to 5.6 mg/kg total PCBs in these samples. The sample results are summarized on Table 1.

As was discussed during the March 19, 2008, site visit, the bank excavated immediately upstream of this area encountered a large amount of construction debris and fill material further into the bank. Based on visual assessment, it appears similar material would be encountered in this area. In addition, the high velocity of the river adjacent to this area will make control of turbidity difficult.

Based on the following facts:

1. The three locations where residuals contained PCB concentrations greater than 1 mg/kg are located 6 to 8 inches beneath bed soils.
2. The bank surface concentrations are already less than 1 mg/kg.
3. Visual residuals within the bank were not identified during the test excavations.

4. The fill material further within the bank consists of unknown materials and may be difficult to remove without cutting back top of bank.

We request that this 200 foot area of Mill banks be covered with geotextile fabric where possible, fine stone for stability, followed by placement of erosion control rip rap over the fine stone to minimize any erosion in the area. Weyerhaeuser understands that this may not be a final remedy along this section of bank depending on results of the Remedial Investigation and potential future land use.

We would appreciate your immediate response to this request so that we can complete this work and place the erosion protection along this area as soon as possible. Please contact Jim Hutchens, Kathy Huibregtse, or myself if you have any questions or would like to discuss this issue further. Thank you for your prompt attention to this matter. As we indicated for the small areas east of this zone, the sooner we limit erosion along these banks, the better for the property owner.

Sincerely,
Weyerhaeuser Company

Jennifer Hale
Environmental Manager

cmk/attachments

cc: Paul Bucholtz, MDEQ
Erik Wilson, City of Plainwell
Kathy Huibregtse, RMT, Inc.
Jim Hutchens, RMT, Inc.

# TABLE 1

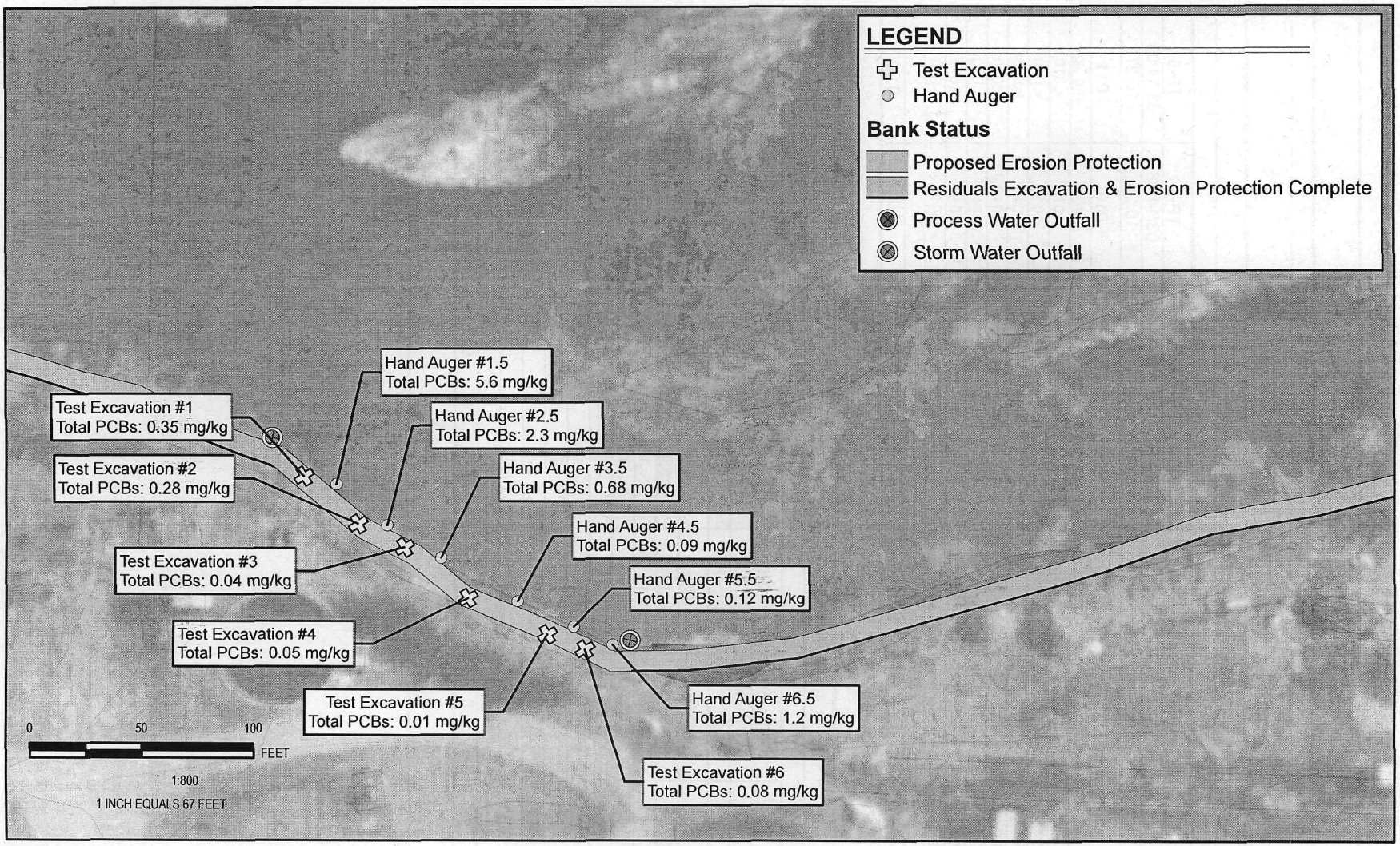
## Zone C - Downstream

### Initial Test Excavation Samples

| | | TP-1 | TP-2 | TP-3 | TP-4 | TP-5 | TP-6 |
|---|---|---|---|---|---|---|---|
| **Sample Date** | | 03/14/08 | 03/14/08 | 03/14/08 | 03/14/08 | 03/14/08 | 03/14/08 |
| **Sampe Time** | | 9:42 | 9:51 | 10:00 | 10:13 | 10:20 | 10:27 |
| **Lab ID** | | **006** | **007** | **008** | **009** | **010** | **011** |
| Analyte | **CAS** | **mg/kg** | **mg/kg** | **mg/kg** | **mg/kg** | **mg/kg** | **mg/kg** |
| Aroclor-1016 | 12674-11-2 | <.12 | <.10 | <.01 | <.097 | <.010 | <.010 |
| Aroclor-1221 | 11104-28-2 | <.12 | <.10 | <.01 | <.097 | <.010 | <.010 |
| Aroclor-1232 | 11114-16-5 | <.12 | <.10 | <.01 | <.097 | <.010 | <.010 |
| Aroclor-1242 | 53469-21-9 | <.12 | <.10 | <.01 | <.097 | <.010 | <.010 |
| Aroclor-1248 | 12672-29-6 | <.12 | <.10 | <.01 | <.097 | <.010 | <.010 |
| Aroclor-1254 | 11097-69-1 | 0.350 | 0.280 | 0.043 | 0.052 | 0.012 | 0.075 |
| Aroclor-1260 | 11096-82-5 | <.12 | <.10 | <.01 | <.097 | <.010 | <.010 |
| | | | | | | | |
| **Total PCBs mg/kg** | | **0.35** | **0.28** | **0.04** | **0.05** | **0.01** | **0.08** |

### Hand Auger Samples

| | | TP-1.5 | TP-2.5 | TP-3.5 | TP-4.5 | TP-5.5 | TP-6.5 |
|---|---|---|---|---|---|---|---|
| **Sample Date** | | 03/19/08 | 03/19/08 | 03/19/08 | 03/19/08 | 03/19/08 | 3/19/2008 |
| **Sampe Time** | | 12:10 | 12:12 | 12:17 | 12:22 | 12:26 | 12:37 |
| **Lab ID** | | **013** | **014** | **015** | **016** | **017** | **018** |
| Analyte | **CAS** | **mg/kg** | **mg/kg** | **mg/kg** | **mg/kg** | **mg/kg** | **mg/kg** |
| Aroclor-1016 | 12674-11-2 | <.11 | <.10 | <.10 | <.010 | <.011 | .47DP |
| Aroclor-1221 | 11104-28-2 | <.11 | <.10 | <.10 | <.010 | <.011 | <.092 |
| Aroclor-1232 | 11114-16-5 | <.11 | <.10 | <.10 | <.010 | <.011 | <.092 |
| Aroclor-1242 | 53469-21-9 | <.11 | <.10 | <.10 | <.010 | <.011 | .56DP |
| Aroclor-1248 | 12672-29-6 | 3.8DP | 1.6D | .46D | <.010 | 0.067 | <.092 |
| Aroclor-1254 | 11097-69-1 | 1.8D | .65D | .22D | 0.09 | 0.049 | .17D |
| Aroclor-1260 | 11096-82-5 | <.11 | <.10 | <.10 | <.010 | <.011 | <.092 |
| | | | | | | | |
| **Total PCBs mg/kg** | | **5.60** | **2.25** | **0.68** | **0.092** | **0.116** | **1.84** |




WORKING COPY

RMT
150 N. Patrick Blvd., Suite 180
Brookfield, WI 53045-5854
Phone: 262-879-1212
Fax: 262-879-1220

**WEYERHAEUSER COMPANY**
**KALAMAZOO RIVER SUPERFUND SITE**

**ZONE C - HIGH FLOW VELOCITY**
**ADDITIONAL BORINGS**

| | |
|---|---|
| DRAWN BY: | WEBERN |
| APPROVED BY: | |
| PROJ. NO.: | 00-05130.04 |
| FILE NO.: | 51300407.ZoneC.mxd |
| DATE: | MARCH 2008 |

D:\05130\04\51300407.ZoneC.mxd

FIGURE 1

RMT

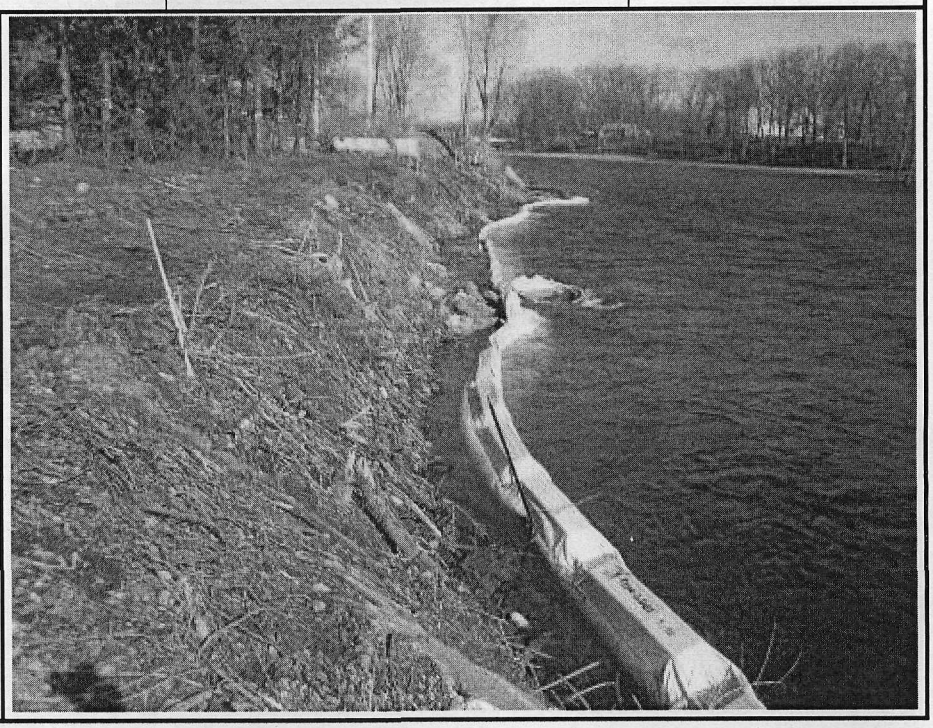
# Photographic Log

| Client Name: | Site Location: | Project No.: |
|---|---|---|
| Weyerhaeuser | Plainwell | 5130.05 |

| Photo No. | Date |
|---|---|
| 1 | 3/19/08 |

**Description**

Zone C Area requesting covering with erosion control without excavation



| Photo No. | Date |
|---|---|
| 2 | 3/19/08 |

**Description**

Zone C Area requesting covering with erosion control without excavation

RMT

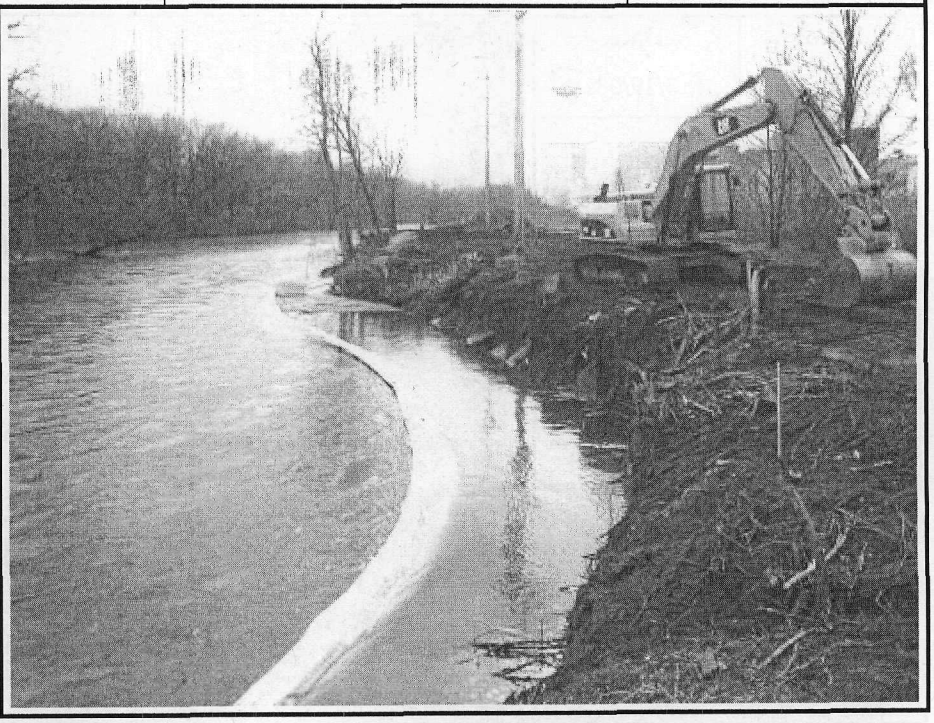
# Photographic Log

| Client Name: | Site Location: | Project No.: |
|---|---|---|
| Weyerhaeuser | Plainwell | 5130.05 |

| Photo No. | Date |
|---|---|
| 3 | 3/19/08 |

**Description**

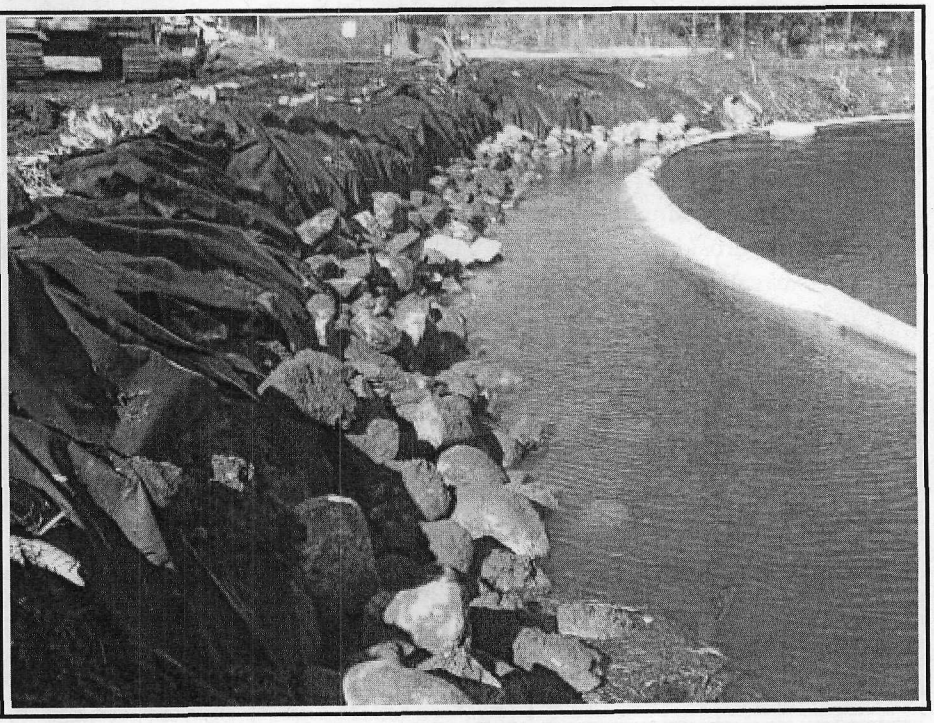
Zone C – Area immediately upstream – Note large amounts of concrete and fill in bank



| Photo No. | Date |
|---|---|
| 4 | 3/20/08 |

**Description**

Zone C – Area immediately upstream after placement of geotextile fabric and stone.



"Paul Bucholtz"
<bucholtzp@michigan.gov>
03/27/2008 12:50 PM

To Sam Chummar/R5/USEPA/US@EPA

cc "ewilson@plainwell.org" <ewilson@plainwell.org>, "James Hutchens" <James.Hutchens@rmtinc.com>, "'Kathy Huibregtse'" <Kathy.Huibregtse@rmtinc.com>, "Jennifer Hale" <jennifer.hale@weyerhaeuser.com>

bcc

Subject Re: Response required: WY Letter for Zone C

Sam,

I agree with the approach discussed in the document and with the acknowledgment that additional work may be required in the future. I would remove item 1 from the bottom of the first page as it implies more knowledge of this area than the sampling was intended to acquire. I believe the justification is strong enough without the statement and the sampling is better described in the second paragraph.

Let me know if you have any questions.

>>> "Hale, Jennifer" <jennifer.hale@weyerhaeuser.com> 3/26/2008 8:05 PM >>>
Sam,

As discussed in the field with James Huchens on March 19, the attached letter is for your review and approval for the proposed actions related to Zone C on the Plainwell Mill Banks. In advance, thank you for your time to review and respond to this request.

Please contact James Hutchens, Kathy Huibregtse or I with any further questions.

Regards,

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I arise in the morning torn between a desire to improve the world and a desire to enjoy the world. This makes it hard to plan the day. E.B.White

Paul Bucholtz
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